

To: Licensing Authority, London Borough of Brent

Application Reference: 39394

Applicant: Silvertime Amusements Limited

Premises: 446 High Road & 8 Park Lane, Wembley, HA9 6AH

Proposed Use: Expanded Adult Gaming Centre (AGC)

Date: September 2026

I am writing to register my objection to the application by Silvertime Amusements Limited to expand the existing Adult Gaming Centre at 446 High Road into the adjoining premises at 8 Park Lane.

My objection is based principally on two of the licensing objectives under the Gambling Act 2005:

- Preventing gambling from being a source of crime or disorder, or being associated with crime or disorder; and
- Protecting children and other vulnerable persons from being harmed or exploited by gambling.

A question of the character of our high street

This is not simply a question of whether another commercial premises can operate on Wembley High Road. We should consider what kind of high street we want to create for our residents.

Wembley High Road is a busy and heavily used part of our community. It is also an area where many people are facing significant pressures with the cost of living, insecure finances, debt and the everyday struggle to make ends meet.

Against that background, I have serious concerns about substantially increasing the presence and capacity of an electronic gambling premises in this location.

Gambling premises are designed to generate frequent and repeated spending. The concern stems from such premises being located in areas with significant financial and social vulnerability. People who are already struggling financially should not be exposed to an ever-greater concentration of opportunities to lose money on the high street.

While I recognise that gambling is a legal activity and that adults have the right to make their own choices, that does not mean that a licensing authority should ignore the circumstances in which gambling premises operate or the particular vulnerabilities of the communities in which they are located.

Crime, disorder and the public realm

I am also concerned about the potential impact on crime and disorder. Wembley High Road already experiences problems associated with anti-social behaviour, theft, street disorder and the congregation of people in busy public areas. Increasing the size of a gambling premises in this location risks adding to those pressures.

The concern is not simply about what happens inside the premises. A licensing authority should also consider the wider effect of a gambling venue on the surrounding public realm, including the people who gather around such premises and the impact this can have on other businesses, residents and pedestrians.

In my view, preventing problems from arising in the first place is preferable to relying solely on CCTV, security measures or staff intervention once problems have already developed.

Protecting children and vulnerable adults

The location is also important because this is a community in which children, young people and vulnerable adults regularly use the High Road and surrounding streets. An expanded gambling premises would increase the physical presence and visibility of gambling along a route used every day by local residents, including children travelling to and from schools and nurseries.

There is also a particular moral concern where gambling premises are located close to services used by people experiencing financial hardship. Our responsibility as a council is not simply to ask whether something is technically lawful. We should also consider whether its expansion is appropriate in the circumstances of the community around it.

I am concerned that increasing gambling provision in an area where many residents are already under financial pressure risks placing a commercial opportunity directly alongside people who may be particularly susceptible to gambling-related harm.

The cumulative impact on Wembley

This application should also be considered in the context of the existing concentration of gambling premises around Wembley High Road.

The question before the Sub-Committee is therefore not simply whether one more premises can operate in isolation. It is whether expanding an existing gambling venue is consistent with the character of this particular part of Wembley and with our responsibility to protect vulnerable residents and maintain safe, welcoming high streets.

Wembley deserves a high street that provides opportunities for families, young people, residents and independent businesses. I do not believe that substantially increasing the footprint of an electronic gambling venue contributes positively to that objective.

For the reasons above, I respectfully ask the Licensing Sub-Committee to refuse this application.